

Winston & Strawn LLP
101 California Street
San Francisco, CA 94111-5802

Krista M. Enns (SBN: 206430)
kenns@winston.com
WINSTON & STRAWN LLP
101 California Street
San Francisco, CA 94111-5802
Telephone: (415) 591-1000
Facsimile: (415) 591-1400

Dan K. Webb (*pro hac vice*)
dwebb@winston.com
J. Erik Connolly (*pro hac vice*)
econnolly@winston.com
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700

Attorneys for Plaintiff
CISCO SYSTEMS, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CISCO SYSTEMS, INC.,

Plaintiff,

v.

STMICROELECTRONICS, INC. and
STMICROELECTRONICS, S.r.l.,

Defendant.

Case No. 5:14-cv-03236-RMW-HRL

**JOINT STIPULATION AND []
ORDER TO EXTEND TIME TO SUBMIT
EVIDENCE IN SUPPORT OF PLAINTIFF
CISCO SYSTEMS, INC.'S MOTION TO
SEAL PURSUANT TO LOCAL RULE
79-5(e)**

Plaintiff Cisco Systems, Inc. ("Cisco") and Defendants STMicroelectronics, Inc. ("STMicro-US") and STMicroelectronics, S.r.l. ("STMicro-Italy," and collectively, "Defendants"), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on July 14, 2015, Cisco filed its opposition to STMicro-Italy's motion to dismiss for lack of personal jurisdiction (the "Opposition," ECF No. 106);

WHEREAS, the Opposition includes various exhibits, including seven with respect to which Cisco believes STMicro-US and/or STMicro-Italy will take the position that they should be filed under seal, specifically:

1. ECF No. 105-3 – Exhibit B to DECLARATION OF THIERRY SOLOMON IN SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.'S OPPOSITION TO STMICROELECTRONICS, S.R.L.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED.
2. ECF No. 105-5 – Exhibit C to DECLARATION OF THIERRY SOLOMON IN SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.'S OPPOSITION TO STMICROELECTRONICS, S.R.L.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED.
3. ECF No. 105-7 – Exhibit D to DECLARATION OF THIERRY SOLOMON IN SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.'S OPPOSITION TO STMICROELECTRONICS, S.R.L.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED.
4. ECF No. 105-9 – Exhibit E to DECLARATION OF THIERRY SOLOMON IN SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.'S OPPOSITION TO STMICROELECTRONICS, S.R.L.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED.
5. ECF No. 105-11 – Exhibit F to DECLARATION OF THIERRY SOLOMON IN SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.'S OPPOSITION TO STMICROELECTRONICS, S.R.L.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED.
6. ECF No. 105-13 – Exhibit A to DECLARATION OF ARDAVAN POURHAMZEH IN SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.'S OPPOSITION TO STMICROELECTRONICS, S.R.L.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED.
7. ECF No. 105-15 – Exhibit A to DECLARATION OF RICHARD MARSZALIK IN SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.'S OPPOSITION TO STMICROELECTRONICS, S.R.L.'S MOTION TO DISMISS FOR LACK OF

Winston & Strawn LLP
101 California Street
San Francisco, CA 94111-5802

PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S)
SOUGHT TO BE SEALED.

WHEREAS, Cisco filed an administrative motion to seal each of these exhibits (ECF No. 105);

WHEREAS, pursuant to Local Rule 79-5(e), Defendants have until July 20, 2015 (because the fourth day from Cisco's July 14, 2015 filing falls on a weekend day) to file a declaration to support the sealing;

WHEREAS, the parties have agreed to extend Defendants' time to file a declaration as required by Local Rule 79-5(e) to July 30, 2015;

NOW THEREFORE, Cisco and Defendants stipulate as follows, subject to the Court's approval:

- Defendants shall have until July 30, 2015, to file and serve a declaration in support of sealing pursuant to Local Rule 79-5(e).

IT IS SO STIPULATED.

Dated: July 17, 2015

WINSTON & STRAWN LLP

By: /s/ Krista M. Enns
Krista M. Enns
Attorneys for Plaintiff
CISCO SYSTEMS, INC.

Dated: July 17, 2015

SIDLEY AUSTIN LLP

By: /s/ Nicole Ryan
Nicole Ryan
Attorneys for Defendant
STMICROELECTRONICS, INC.


Dated: July 17, 2015

SIDLEY AUSTIN LLP

By: /s/ Nicole Ryan
Nicole Ryan
Attorneys for Defendant
STMICROELECTRONICS, S.r.l.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2
3 Dated: July 9, 2015


Ronald M. Whyte
United States District Judge

4
5
6 **LOCAL RULE 5-1 ATTESTATION**

7 I, Krista M. Enns, am the ECF User whose ID and password was used to file this JOINT
8 STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO SUBMIT EVIDENCE IN
9 SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.'S MOTION TO SEAL PURSUANT TO
10 LOCAL RULE 79-5(e). In compliance with Local Rule 5-1(i)(3), I hereby attest that, counsel for
11 Defendants, concurred in this filing.

12
13 Dated: July 17, 2015

By: /s/Krista M. Enns
Krista M. Enns

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Winston & Strawn LLP
101 California Street
San Francisco, CA 94111-5802